

# **Exhibit**

# **A**



## Service of Process Transmittal Summary

**TO:** Yehuda Alpert  
CENTERS HEALTH CARE  
4770 WHITE PLAINS RD  
BRONX, NY 10470-1104

**RE:** Process Served in Rhode Island

**FOR:** OAK HILL OPERATIONS ASSOCIATES LLC (Domestic State: RI)

### ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Re: MARIA ARAUJO // To: OAK HILL OPERATIONS ASSOCIATES LLC

**CASE #:** PC202203790

**NATURE OF ACTION:** Employee Litigation

**PROCESS SERVED ON:** C T Corporation System, East Providence, RI

**DATE/METHOD OF SERVICE:** By Process Server on 07/13/2022 at 15:15

**JURISDICTION SERVED:** Rhode Island

**ACTION ITEMS:** CT will retain the current log  
Image SOP  
Email Notification, Yehuda Alpert yalpert@centershealthcare.org

**REGISTERED AGENT CONTACT:** C T Corporation System  
450 Veterans Memorial Highway  
Suite 7A  
East Providence, RI 02914  
866-539-8692  
CorporationTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



**STATE OF RHODE ISLAND**  
**SUPERIOR COURT**  
**SUMMONS**

		<b>Civil Action File Number</b> PC-2022-03790
<b>Plaintiff</b> Maria Araujo v. OAK HILL OPERATIONS ASSOCIATES, LLC. <b>Defendant</b>		<b>Attorney for the Plaintiff or the Plaintiff</b> Sean M Mcateer
		<b>Address of the Plaintiff's Attorney or the Plaintiff</b> 203 SOUTH MAIN STREET 3RD FLOOR PROVIDENCE RI 02903
Licht Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250		<b>Address of the Defendant</b> 544 Pleasant Street Pawtucket RI 02860 <i>c/o Agent- CT Corporation System USO Veterans Mem. Play. East Providence, RI</i>

**TO THE DEFENDANT: OAK HILL OPERATIONS ASSOCIATES, LLC**

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 7/12/2022.

/s/ Stephen Burke  
Clerk

Witness the seal/watermark of the Superior Court

A TRUE COPY ATTEST  
HAROLD OUIMETTE  
Constable #6129  
Date 1/1/22

SC #137

07/13/22



**STATE OF RHODE ISLAND**  
**SUPERIOR COURT**

**Plaintiff**

Maria Araujo

v.

OAK HILL OPERATIONS ASSOCIATES, LLC.

**Defendant****Civil Action File Number**

PC-2022-03790

**PROOF OF SERVICE**

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, OAK HILL OPERATIONS ASSOCIATES, LLC., by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person of suitable age and discretion \_\_\_\_\_

Address of dwelling house or usual place of abode \_\_\_\_\_

Age \_\_\_\_\_

Relationship to the Defendant \_\_\_\_\_

- ☐ With an agent authorized by appointment or by law to receive service of process.

Name of authorized agent \_\_\_\_\_

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.

Name of person and designation \_\_\_\_\_

- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.

- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.

Name of person and designation \_\_\_\_\_





## STATE OF RHODE ISLAND

## SUPERIOR COURT

Upon a private corporation, domestic or foreign:

- ☐ By delivering said papers to an officer or a managing or general agent:

Name of person and designation \_\_\_\_\_

- ☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation \_\_\_\_\_

- ☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent \_\_\_\_\_

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ I was unable to make service after the following reasonable attempts: \_\_\_\_\_

SERVICE DATE: \_\_\_\_\_

Month Day Year

SERVICE FEE \$ \_\_\_\_\_

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE \_\_\_\_\_

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED

Signature \_\_\_\_\_

State of \_\_\_\_\_

County of \_\_\_\_\_

On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, before me, the undersigned notary public, personally appeared \_\_\_\_\_

or ☐ personally known to the notary

or ☐ proved to the notary through satisfactory evidence of identification, which was \_\_\_\_\_

to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: \_\_\_\_\_

My commission expires: \_\_\_\_\_

Notary identification number: \_\_\_\_\_

**STATE OF RHODE ISLAND**  
PROVIDENCE, SC. SUPERIOR COURT

MARIA ARAUJO

v.

PC-2022-~~3790~~

OAK HILL OPERATIONS ASSOCIATES, LLC

**AMENDED COMPLAINT**

1. Plaintiff Maria Araujo ('Araujo' or plaintiff hereinafter) is now, and at all times pertinent to this complaint, a resident of the City of Pawtucket, County of Providence, State of Rhode Island.

2. Defendant is a New York corporation, authorized to do business in Rhode Island.

3. Defendant owns and operates Oak Hill Health and Rehabilitation Center ('Oak Hill' hereinafter) in Pawtucket, Rhode Island.

4. Defendant employed plaintiff at Oak Hill at all times pertinent hereto.

5. In or around autumn 2018 and after, plaintiff made discovery of mismanagement, irregularities, and wrongdoing in how defendant dealt with their patients.

6. In or around November 2018, plaintiff discovered a patient of defendant's on the floor of her workplace.

7. In autumn 2019, as well as earlier, plaintiff reported this patient on the floor to employees of defendant.

8. In autumn 2019, as well as earlier, plaintiff reported this patient on the floor to her work supervisor.

9. Employees and agents of defendant failed to heed plaintiff's report and warning.

10. Defendant's employees, including plaintiff's work supervisor, failed to assist said patient off the floor for a significant time.

11. Defendant's employees, including plaintiff's work supervisor, interfered with and prevented plaintiff from assisting said patient off the floor for a significant time.

12. In or around autumn 2019, defendant's employees utilized patient credit cards for their own expenses, including food.

13. Plaintiff reported this patient credit card usage to her work supervisor.

14. In or around autumn 2019, defendant's employees failed to timely provide patient pain medication.

15. Plaintiff reported these timely medication failures to her work supervisor.

16. Plaintiff's work supervisor has instructed and demanded plaintiff perform work and missions for which she is not legally licensed.

17. Plaintiff has complained to her work supervisor that she is not licensed for the work and missions that defendant has required of her.

18. Defendant discharged plaintiff from employment in or around December 2019.

19. Defendant retaliated against plaintiff's actions described in the above previous paragraphs by deliberately attempting to inflict shock and intimidation upon plaintiff.

20. Defendant retaliated against plaintiff's actions described in the above previous paragraphs by deliberately threatening her with unjustified discipline and punishment, including said discharge.

21. Defendant retaliated against plaintiff's actions described in the above previous paragraphs by deliberately spreading rumors and innuendo, *via* spoken and written word, to diverse other persons and entities that plaintiff was inefficient and irresponsible.

22. Defendant retaliated against plaintiff's actions described in the above previous paragraphs by deliberately spreading rumors and innuendo, *via* spoken and written word, to diverse other persons and entities that plaintiff was insubordinate.

23. These statements by employees of defendant as described in the two (2) previous paragraphs were not privileged, were and are wholly and completely false and are known to be so by those uttering same.

24. These statements by defendant's employees were calculated to harm plaintiff's reputation amongst those who heard them, asserting plaintiff was dishonest, inefficient, insubordinate, and irresponsible.

25. Plaintiff's reputation and employment have been harmed by reason of these statements as above-described.

26. The harm to plaintiff's reputation inflicted by defendant's employees has proximately resulted in grievous mental harm, including shock, humiliation, and disgrace.

27. Defendant's actions complained of herein were all committed despite their knowledge of the law as then existing and are arbitrary, capricious, and constitute an abuse of discretion and/or an unwarranted and unjustified exercise of discretion.

28. Defendant used their false accusation as grounds to terminate plaintiff's employment.

29. Defendant's above-described acts and omissions in harming plaintiff's employment, security, reputation, and peace of mind during the course of 2019 were taken in deliberate retaliation for her discovery of and complaints about defendant's wrongful actions and omissions, compliance irregularities, and plaintiff's insistence on doing right.



30. Defendant's acts and omissions in harming plaintiff's employment, reputation, and well-being were in violation of General Laws 28-50-1 *et.seq.*

31. As a direct and proximate result of defendant's violation of General Laws 28-50-1 *et.seq.*, plaintiff has been greatly damnified, including shame and humiliation, loss of reputation, lost wages, and the incurrence of attorney's fees.

WHEREFORE, plaintiff demands judgment against defendant in an amount sufficient to confer jurisdiction upon this Honorable Court as well as an award of interest, costs, attorney's fees, and punitive damages.

**PLAINTIFF HEREBY DEMANDS TRIAL BY JURY ON  
ALL JURY-TRIABLE ISSUES**

Respectfully submitted,  
PLAINTIFF,  
By Her Counsel  
/s/ Sean M. McAteer, #4118  
203 South Main Street, #3A  
Providence, R.I. 02903  
(401) 946-9200  
fax # 861-6602  
summerromance@verizon.net

See this notice in Cambodian, Spanish, and Portuguese on the attached pages. **Español:** Véase esta notificación en camboyano, español y portugués en las páginas adjuntas. **Português:** Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



## NOTICE

**You have a case in the Rhode Island state court system.**

**You have the right to an interpreter at no cost to you.**

Rhode Island Supreme Court Executive Order 2012-05 states that when a Limited-English Proficient (LEP) person appears in court, the Rhode Island Judiciary will provide a free authorized interpreter for the defendant, plaintiff, witness, victim, parent of a juvenile, or someone with a significant interest in the court proceeding. This interpreting service is provided at no cost to the parties and in all types of cases, both civil and criminal. Court interpreters work in all the courthouses of the Rhode Island state court system.

**To schedule an interpreter for your day in court, you have the following options:**

1. **Call the Office of Court Interpreters at (401) 222-8710, or**
2. **Send an email message to [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov), or**
3. **Visit the interpreters' office to schedule an interpreter:**

**The Office of Court Interpreters  
Licht Judicial Complex  
Fourth Floor, Room 401  
250 Benefit Street  
Providence, RI 02903**

**When requesting an interpreter, please provide the following information:**

**The name and number of your case  
The language you are requesting  
The date and time of your hearing  
The location of your hearing  
Your name and a telephone number where we can reach you or your lawyer**

For more information in Portuguese, Russian, and Spanish, including a listing of court forms that are available in Spanish, please visit our website on the Internet:

<https://www.courts.ri.gov/Interpreters/englishversion/Pages/default.aspx>.

To request a translation of this notice into any other language, please call the Office of Court Interpreters at (401) 222-8710. It would be helpful to have an English speaker with you when you call.

The Rhode Island Judiciary is committed to making the courts accessible to all.

**The Office of Court Interpreters  
Licht Judicial Complex Fourth  
Floor Room 401  
250 Benefit Street  
Providence, RI 02903**

See this notice in Cambodian, Spanish, and Portuguese on the attached pages.

**Camboyano: SAMPLE:** [Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.]

**Español:** Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.

**Português:** Leia esta notificação em camboyano, espanhol e português nas páginas em anexo.



## NOTIFICAÇÃO

**V. Ex.<sup>a</sup> tem um processo em curso no sistema judiciário do Estado de Rhode Island,**

**V. Ex.<sup>a</sup> tem direito aos serviços gratuitos de um intérprete.**

A Ordem Executiva 2012-05 do Supremo Tribunal de Rhode Island prevê que quando uma pessoa com conhecimentos limitados da língua inglesa (*Limited-English Proficient*) (LEP) comparece em tribunal, a Administração Judiciária de Rhode Island disponibiliza-lhe gratuitamente os serviços de um intérprete autorizado a um réu, autor, testemunha, vítima, pai, ou mãe de um menor ou alguém com interesse significativo no processo judicial. O serviço de intérprete é prestado gratuitamente às partes e em todos os tipos de processos, sejam eles civis ou penais. Os intérpretes do tribunal trabalham em todos os tribunais do sistema judiciário do Estado de Rhode Island.

Para agendar os serviços de um intérprete para o seu dia no tribunal, temas seguintes opções:

1. Telefonar para o Gabinete de Intérpretes Judiciais através do n.º (401) 222-8710, ou
2. Enviar uma mensagem de correio eletrónico para [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov), ou
3. Deslocar-se ao gabinete de intérpretes para agendar os serviços de um intérprete:

Gabinete de Intérpretes Judiciais  
Complexo Judicial Licht  
Quarto Piso, Sala 401  
250 Benefit Street  
Providence, RI 02903

Quando solicitar os serviços de um intérprete deve fornecer os seguintes dados:

- O nome e número do seu processo
- O idioma que solicita
- A data e hora da sua audiência
- O local da sua audiência
- O seu nome e um número de telefone para o podermos contactar a si ou ao seu advogado

Para obter mais informações em português, russo e espanhol, incluindo uma lista dos formulários judiciais disponíveis em espanhol, visite o nosso website na internet:

<https://www.courts.ri.gov/interpreters/englishversion/pages/default.aspx>.

Para solicitar uma tradução desta notificação para qualquer outro idioma, telefone para o Gabinete de Intérpretes Judiciais através do número (401) 222-8710. Recomenda-se que esteja acompanhado por alguém que fale inglês quando fizer a chamada.

A Administração Judiciária de Rhode Island está empenhada em tornar os tribunais acessíveis para todos.

Gabinete de Intérpretes Judiciais  
Complexo Judicial Licht  
Quarto Piso, Sala 401  
250 Benefit Street  
Providence, RI 02903

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 Português: Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



## AVISO

**Usted tiene un caso en el sistema judicial de Rhode Island.**

**Usted tiene el derecho a tener un intérprete sin costo para usted.**

La Orden Ejecutiva 2012-05 del Tribunal Supremo de Rhode Island dicta que cuando una persona que tiene un dominio limitado del inglés (LEI) comparece ante la corte, el Sistema Judicial de Rhode Island le proveerá un intérprete autorizado gratis sea el acusado/demandado, demandante, testigo, víctima, padre de un menor de edad alguien que tenga con un interés importante en el proceso de la corte. Este servicio de interpretación se le proveerá sin costo alguno a los participantes en toda clase de caso, sea civil o penal. Los intérpretes judiciales trabajan en todos los tribunales del Sistema Judicial de Rhode Island.

Para solicitar un intérprete para su comparecencia en el tribunal, usted tiene las siguientes opciones:

1. Llamar a la Oficina de Intérpretes en el tribunal al 401-222-8710;
2. Mandar un correo electrónico a [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov);
3. Presentarse a la Oficina de Intérpretes para solicitar un intérprete;

The Office of Court Interpreters  
 Light Judicial Complex  
 Cuarto Piso, Oficina 401 A-B  
 250 Benefit Street  
 Providence, RI 02903

Al solicitar un intérprete, por favor provea la siguiente información:

- El nombre y el número de su caso
- El idioma que solicita
- La fecha y hora de su audiencia
- Dónde va a tomar lugar su audiencia
- Su nombre y número de teléfono por el cual nos podamos poner en contacto con usted o con su abogado.

Para obtener más información en portugués, ruso o español, incluyendo una lista de formularios de la corte que están disponibles en español, visite nuestra página de internet:

<https://www.courts.ri.gov/interpreters/englishversion/Pages/default.aspx>

Para solicitar la traducción de este aviso en cualquier otro idioma, por favor llame a la oficina de intérpretes al (401) 222-8710. Ayudará si usted puede estar en compañía de una persona que habla inglés cuando llame.

El sistema jurídico de Rhode Island se compromete a proporcionar a todas las personas mejor acceso a los tribunales.

The Office of Court Interpreters  
 Light Judicial Complex  
 Fourth Floor Room 401  
 250 Benefit Street  
 Providence, RI 02903





សីលធម៌ក្នុងជីវភាពរស់នៅរបស់ខ្មែរ ឲ្យស្បៀង និងកុំឲ្យបាត់បង់សេចក្តីស្រឡាញ់។

សេចក្តីជូនដំណឹង

ហេតុអ្វីមានបណ្តាងនៅក្នុងប្រព័ន្ធតុលាការនេះ? Rhode Island?

លោកអ្នកមានសិទ្ធិស្នើសុំអ្នកបំពេញដោយឥតគិតថ្លៃសម្រាប់ខ្លួនឯង។

ដីកាប្រតិបត្តិរបស់តុលាការតំណាង Rhode Island (Rhode Island Supreme Court Executive Order) លេខ 2012-05 បានកំណត់ថា វេសប្រភេទមួយដែលមានឈ្មោះ ដីកាប្រតិបត្តិការស្រាវជ្រាវស្រាវ (LEP) ឬបញ្ញត្តិស្រាវជ្រាវស្រាវ តុលាការ Rhode Island និងផ្តល់អ្នកប្រើដែលបានអនុញ្ញាតយោគស្នាមដៃជាប់ចំណុច ផែនការ សាក្សី ជំនួយការ

សំណុំបំណែងសំនុំរ៉ូបូត ឬឥណ្ឌូប្រាសាទបុរាណវត្ថុជាដើមនៅក្នុងតំបន់កោះត្រាវ៉ាន់កា។ លោកម្ចាស់ប្រជុំនេះ ត្រូវបានផ្តល់ជូនដោយអាជ្ញាធរថ្នាក់ក្រីក្រ និងនៅត្រង់ច្រកទន្លេបង្កោង ភ្នំបង្អែកកោង និងព្រៃឈូងឆ្នាំ។ មិត្តមេធាវីត្រូវបានគេស្គាល់ថា ធ្វើការរកស៊ីក្នុងគ្រប់តំបន់កោះកំពង់ស្ពឺសំបូរព័ត៌មានក្នុងកោះនៃរ៉ូបូត Rhode Island។ ដើម្បីក្លាយជាសំណុំបំណែងសំនុំរ៉ូបូត ត្រូវបានរកស៊ីនៅក្នុងសំណុំបំណែងឆ្នាំ។ លោកម្ចាស់នេះបានប្រើសំនុំរ៉ូបូតជាដើម។

1. หากผู้ใดต้องการข้อมูลเพิ่มเติมกับนักกฎหมายอาสาสมัครหมายเลข (401) 222-8710
2. สามารถติดต่อ [interpreterfeedback@courts.rj.gov](mailto:interpreterfeedback@courts.rj.gov)
3. เพื่อได้รับแบบฟอร์มผู้สมัครงานในโครงการนี้

The Office of Court Interpreters  
 Light Judicial Complex  
 Fourth Floor, Room 401  
 250 Benefit Street  
 Providence, RI 02903

នៅពេលដែលអ្នកបោះឆ្នោត ឈប់បញ្ជូនព័ត៌មានដល់ប្រព័ន្ធគ្រប់គ្រង៖

២. រដ្ឋបាល និងសហគមន៍ក្រៅរដ្ឋបាល
៣. អាជ្ញាធរមានសមត្ថកិច្ច
៤. អាជ្ញាធរស្តីពី បរិស្ថាន និងការអភិរក្សធនធាន
៥. អង្គការសហគមន៍ក្រៅរដ្ឋបាល
៦. បុគ្គលិក និងសហគមន៍ក្រៅរដ្ឋបាល

គ្រប់គ្រងមាតិកានៃប្រព័ន្ធដារកាតាស្ត្រូប ដែលបានរៀបចំ និងអនុវត្ត រួមទាំងបញ្ជូនប្រគល់ប័ណ្ណទៅដល់អគ្គនាយកដ្ឋានស្ថាប័នពាក់ព័ន្ធ ដូចជា អគ្គនាយកដ្ឋានស្ថាប័នពាក់ព័ន្ធ ដើម្បីអនុវត្ត និងត្រួតពិនិត្យការអនុវត្ត។

<https://www.courts.nj.gov/Interpreters/englishversion/Pages/default.aspx>.

ដើម្បីស្នើសុំការបង្កើតប្រព័ន្ធទិន្នន័យឯកជនជាតាមការស្នើសុំរបស់ខ្ញុំ លុះត្រាតែមានការយល់ព្រមពីអង្គការប្រជាជាតិស្រី (401) 222-8710។  
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